

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

ROSY GIRON DE REYES, *et al.*,

Plaintiffs,

vs.

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP, *et al.*,

Defendants.

Civ. No. 1:16-cv-00563 (LO/TCB)

NOTICE OF PLAINTIFFS' MOTION TO FILE DOCUMENTS UNDER SEAL

Pursuant to Local Civil Rule 5, Plaintiffs Rosy Giron De Reyes, Jose Dagoberto Reyes, Felix Alexis Bolanos, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz ("Plaintiffs") are filing a Motion to File Documents Under Seal ("Motion"). In support of the Motion, Plaintiffs are filing a non-confidential Memorandum in Support of Plaintiffs' Motion to File Documents Under Seal, along with this Notice and a Proposed Order.

This document serves as notice to the public that Plaintiffs, by counsel, have moved the Court to seal from public disclosure certain exhibits to Plaintiffs' Reply Memorandum in Support of Motion *in Limine*. A brief description of the contents of the documents that Plaintiffs request to file under seal is as follows:

- Exhibit 3: Defendants' internal communications which Defendants have marked as confidential.
- Exhibit 4: Confidential excerpts from Defendants' designated 30(b)(6) deposition.
- Exhibit 5: Confidential excerpts from the deposition transcript of Josephine Giambanco.

- Exhibit 7: Confidential excerpts from the deposition transcript of Carolina Easton

Objections to this Motion to File Documents Under Seal should be filed in the Civil Section of the Clerk's Office of this Court. This Notice will be posted for a minimum of 48 hours.

Respectfully submitted,

Date: September 7, 2021

_____/s/_____
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Certificate of Service

I hereby certify that on this 7th day of September, 2021, I caused the foregoing, along with all attachments thereto, to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing (NEF) to all counsel of record.

_____/s/_____
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